

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT**

**ENVIRONMENTAL PROTECTION AGENCY  
REGION IX**

**HAZARDOUS WASTE MANAGEMENT DIVISION  
WASTE COMPLIANCE BRANCH**

**WESTATES CARBON-ARIZONA, INCORPORATED  
EPA ID NO.: AZD982441263**

**March 1994**

**Submitted to:**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 HAWTHORNE STREET  
SAN FRANCISCO, CALIFORNIA 94105**

**Submitted by:**

**SCIENCE APPLICATIONS INTERNATIONAL CORPORATION  
TECHNOLOGY SERVICES COMPANY  
20 CALIFORNIA STREET, SUITE 400  
SAN FRANCISCO, CALIFORNIA 94111**

**EPA CONTRACT NO. 68-W9-0008  
EPA WORK ASSIGNMENT NO. R09035  
SAIC/TSC PROJECT NO. 06-6075-03-1265**

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT**

**ENVIRONMENTAL PROTECTION AGENCY  
REGION IX**

**HAZARDOUS WASTE MANAGEMENT DIVISION  
WASTE COMPLIANCE BRANCH**

Facility: Westates Carbon-Arizona Incorporated  
2523 Mutahar Street, P.O. Box E  
Parker, Arizona 85344

EPA ID Number: AZD982441263

Date of Inspection: March 15, 1994

Inspectors: Peter B. Reich  
Environmental Scientist

Susan Corbaley  
Biologist

Science Applications International Corporation/  
Technology Services Company  
20 California Street, Suite 400  
San Francisco, California 94111  
(415) 399-0140

Facility Representatives: Jeffrey S. Walsh  
Environmental, Health and Safety Manager  
(602) 669-5758

Monte McCue  
Plant Manager  
(602) 669-5758

Report Prepared By: Peter B. Reich

Report Date: April 12, 1994

## **INTRODUCTION**

On March 15, 1994, under Contract No. 68-W9-0008 with the U.S. Environmental Protection Agency, Peter Reich and Susan Corbaley, representing Science Applications International Corporation/Technology Services Company (SAIC/TSC), conducted an unannounced Compliance Evaluation Inspection (CEI) at Westates Carbon-Arizona Incorporated, located at 2523 Mutahar Street, (P.O. Box E) in Parker, Arizona (EPA I.D. No. AZD982441263) on land owned by the Colorado River Indian Tribes (CRIT). Westates is a carbon regeneration facility owned by the Wheelabrator Technologies Company. The purpose of the inspection was to evaluate the facility's compliance with the Interim Status requirements of their Part A Permit Application and the RCRA Hazardous Waste Regulations. Photographs were taken to document the inspection and are included as Attachment 1 of this report. The RCRA CEI Checklist for Interim Status-Treatment, Storage and Disposal Facilities (TSDF) is included as Attachment 2.

In preparation for this CEI, the previous U.S. Environmental Protection Agency-Region IX (EPA) CEI report and the revised Part A Permit Application dated December 17, 1993, were reviewed. A complete list of documents reviewed in preparation for report of the inspection, during the inspection, and in preparing this report can be found in Attachment 3. The Part A Permit Application and associated information is included as Attachment 4.

Present for the CEI were Mr. Reich and Ms. Corbaley, Monte McCue, Westates' Plant Manager, Jeffrey S. Walsh, Westates Environmental, Health and Safety Manager, and Conner Byestewa, Environmental Protection and Agricultural Regulator for CRIT.

## **PERMIT STATUS**

In May of 1989, Westates approached the CRIT with a request to build a carbon reactivation facility in the CRIT Industrial Park in Parker, Arizona. On July 14, 1990, the

CRIT approved the request for the land lease and facility construction on tribal lands. The Agreement between Westates and the CRIT was then submitted to the U.S. Department of the Interior, Bureau of Indian Affairs for final approval. Following an Environmental Assessment for the Westates Project, final approval was granted and a Land Lease Agreement was signed, effective April 1, 1991.

On or about April 1, 1991, Westates filed a Notification of Hazardous Waste Activity with U.S. Environmental Protection Agency, Region IX. Westates was issued an EPA Identification Number (AZD982441263) on May 6, 1991 for the treatment, storage, or disposal of various listed and characteristic wastes. The Part A Permit Application in Attachment 4 contains a list of waste codes handled by Westates.

Effective August 21, 1991, the final rule on the burning of hazardous waste in boilers and industrial furnaces (BIF) including the regulation of carbon regeneration units was addressed by EPA. EPA clarified that carbon regeneration units are thermal treatment units, subject to RCRA permitting requirements. August 21, 1991, the effective date of the BIF rule, was established as the deadline for submittal of Part A Permit Applications.

Westates qualifies for interim status as an existing facility, having submitted a Part A Permit Application prior to August 21, 1991, per 56 FR 7186, Part Three, VIII, A, (1). Westates also qualifies as an existing facility having met the requirements detailed in 40 CFR, Part 266.103 (a)(1)(ii) for facilities under construction.

On or about August 12, 1991, Westates submitted a Part A Permit Application to EPA. A revised Part A Permit Application was submitted on September 4, 1992. This revision was returned to Westates for revisions. The revised Part A was submitted on or about November 30, 1992.

The most recent revised Part A Permit Application, dated December 17, 1993, was submitted to reflect current facility operations and to clarify certain information submitted in the original Part A Application. The revised Part A identifies the following units in operation at Westates:

- S01 (storage in containers). This represents the Container Storage Area, which is one unit. The unit capacity is 100,000 gallons.
- S02 (storage in tanks). This represents 5 units, Tanks T-1 (8,319 gallons), T-2 (8,319 gallons), T-5 (8,319 gallons), T-6 (8,319 gallons), and T-8 (905 gallons). All of these units are Process Feed Tanks; Tank T-8 is the Furnace Feed Tank.
- T04 (other treatment). This represents the Carbon Regeneration Units (CRU) 1 and 2. CRU-1 is currently operational. The capacity is listed as 1,200 lbs/hr. CRU-2 has not been constructed to date.
- Tank listings in the original Part A have been deleted on the revised (12/17/93) Part A to accurately reflect the process codes for the T04 Tanks. A clarification of this can be found on Page 2 of the revised Part A, included as Attachment 4. This represents Tanks T-9, Recycle Water Storage Tank, used to transfer spent carbon. The capacity listed for this unit is 45,000 gallons. Tank T-12 (T04) is a Rainwater Collection Tank with a capacity of 35,000 gallons, and collects rainwater run-off from the warehouse roof and outdoor driveways. This water is then used as makeup water for Tank T-9.
- T04 (other treatment). Tank T-11 is the Industrial Sewer Water Surge Tank, which has a capacity of 35,000 gallons, and collects scrubber blowdown water for blending prior to discharge to the municipal sewer system.

## **SUMMARY OF PREVIOUS COMPLIANCE EVALUATION INSPECTION**

On August 17, 1993, EPA conducted a RCRA CEI at Westates; that was the first RCRA CEI conducted at the facility. A number of violations were determined during this inspection, and, as a result, a Compliance Order was issued to Westates, in the form of a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of RCRA, as amended in 42 U.S.C. §6928(a)(1) and the Consolidated Rules of Practice governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits,

40 CFR Part 22. A number of counts were listed in the Compliance Order; these are in Attachment 5.

Potential violations from the October 27, 1993 Compliance Evaluation Inspection Report included the following:

- 40 CFR §262.34(a)(2) and (3) - The facility failed to mark all containers of hazardous waste with the words "Hazardous Waste" and the accumulation start date.
- 40 CFR §270.71(a)(2) - During interim status, the facility employed a process not specified in Part A of the permit application, in that the facility stored hazardous waste in containers in a location not specified on the Part A.
- 40 CFR §265.193(e)(1)(iii) - The facility failed to maintain the secondary containment system for tanks free of cracks or gaps in the concrete unloading pad (Pad B), and the concrete pad underlying the process area (Pad A), as well as berming associated with Pad A.
- 40 CFR §265.31 - The facility failed to operate in a way that minimizes the possibility of a release of hazardous waste/hazardous waste constituents as evidenced by fugitive emissions observed coming from the top of the dewatering screw on the day of the EPA inspection. Inspection logs also indicate emissions from above the dewatering screw (8/1/93) and leaks from the dewatering screw (8/3/93).
- 40 CFR §265.52(e) - The Contingency Plan does not include the location and a physical description of each item on the list, and a brief outline of its capabilities in that the capabilities of the emergency alarm with four actuaries are not specified in Table 8-2; the number of spare respirators maintained at the facility is not specified in Table 8-2; the capabilities of the 5-minute air pack are not specified in Table 8-2.
- 40 CFR §265.51(a) - The Contingency Plan is not designed to minimize hazards to human health from hazardous waste incidents in that the number of air packs maintained at the facility is not adequate.
- 40 CFR §265.16(d)(4) - The facility failed to maintain records that document that the required training has been completed by facility personnel.
- 40 CFR §265.13(b)(6) and 265.375 - The facility failed to determine the heating value of the waste; the halogen and sulfur content in the waste; and the concentrations in

the waste of lead and mercury. The Spent Carbon Profile Form instructs generators to list all constituents (including halogenated organics) present in any concentration.

- 40 CFR §265.13(b) - The Waste Analysis Plan developed by the facility does not fully describe the procedures to be carried out to comply with 40 CFR §265.13(a) in that it states that under certain circumstances, an analytical is not required of the generator, but it does not specify those circumstances.
- 40 CFR §265.13(b) - The facility failed to follow the procedures described in the Waste Analysis Plan in that the Waste Analysis Plan states that if, based on the visual inspection and laboratory screening analyses, the waste is different from that described in the Spent Carbon Profile Sheet and/or the Uniform Hazardous Waste Manifest, the generator will be contacted by phone and notified of the discrepancy. If the discrepancy is not resolved within five days, the waste will be rejected and returned to the generator.
- 40 CFR §265.192(a) - The facility failed to obtain a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with §270.11 (d) attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.
- 40 CFR §265.195(a)(1) - The facility failed to inspect overfill prevention control at least once each operating day as evidenced by the facility's Daily Inspection Checklists.
- 40 CFR §265.15(d) - The facility failed to record all observations from daily inspections in that the facility did not record in the Daily Inspection Checklist for 8/17/93 emissions from the top of the dewatering screw.
- 40 CFR §265.15(c) - The facility failed to remedy malfunction of equipment revealed by an inspection on a schedule which ensures that the problem does not lead to a human health hazard, as evidenced by one SCBA and one 5-minute airpack which were in need of refilling for six months.
- 40 CFR §265.377(a) - The facility failed to visually observe stack plume (emissions) at least hourly for normal appearance (color and opacity). The Daily Inspection Checklist has a single entry for the hourly inspection of stack plume.
- 40 CFR §265.73(b)(1) - The facility failed to maintain in the operating record a description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by 40 CFR 265 Appendix I.

- 40 CFR §265.73(b)(2) - The facility failed to maintain on the operating record the location of each hazardous waste within the facility and the quantity at each location.
- 40 CFR §270.71(a)(3) - During interim status, the facility exceeded the combined design capacities of Tanks T-1, T-2, T-5, T-6 and T-8 specified in the Part A Permit Application (35,000 gallons), and the same units are identified in the Closure Plan as having a combined capacity of 45,960 gallons.
- 40 CFR §270.72(a)(4) - The new owner/operator of the facility failed to submit a revised Part A Permit Application no later than 90 days prior to the change of ownership when Wheelabrator Technologies, Inc. purchased Westates.

Many of the above issues have been included in the Compliance Order, the resolution for which is under discussion between Westates and EPA.

## INVESTIGATION

The inspectors arrived at the facility at about 8:00 a.m., provided introductions and credentials to Westates, and contacted Monte McCue, Westates' Plant Manager, and Jeffrey S. Walsh, Environmental, Health and Safety Manager. Westates placed a call to Conner Byestewa of the CRIT, who arrived at the facility by 8:30 a.m. and was present for the inbriefing and inspection.

During the inbriefing, Westates' legal counsel participated via speaker phone. The inspectors informed Westates' representatives that SAIC/TSC, representing EPA Region IX, were there to perform a semiannual RCRA CEI, and provided a list of areas to be inspected and documents to be reviewed (Attachment 3). It was also explained to Westates that EPA would use the results of the routine compliance inspection to evaluate Westates' acceptability (under the CERCLA offsite policy) to receive and treat Superfund cleanup waste.



The previous EPA CEI, August 17, 1993, was discussed. Westates' representatives stated that they were unaware that the facility was to be evaluated under the Offsite Policy Program so recently following the previous CEI. The inspectors explained the RCRA and Offsite Policy CEI schedules (annually and semiannually, respectively). Before beginning the facility walk-through, Mr. Walsh explained the Westates Visitor Policy and protocol, which is in Attachment 6.

The inbriefing ended at approximately 9:30 a.m.

The physical inspection began at the facility's pedestrian entryway and fence. Both the pedestrian entry gate and facility vehicle entry gate were posted with the appropriate placard information and warnings in English and Spanish and were clearly visible from 25 feet. A diagram of the facility is included as Attachment 7.

#### **Waste Acceptance**

Mr. Walsh explained the waste acceptance procedures. Generators wishing to send hazardous waste(s) to Westates for treatment must have submitted a waste profile sheet and supporting analytical documentation to the facility in advance.

Hazardous wastes in various forms of spent activated carbon are brought to the facility by trucks, either in 55-gallon drums, roll-off bins, or slurry trucks. The driver arrives at a prescheduled date and time, and pulls up to the facility gate. Drivers provide the appropriate manifests, and Land Disposal Restriction (LDR) forms to Mr. Walsh or other appropriate facility representative, who check this information against the generator's waste profile sheet.

Any discrepancies in manifests, LDRs or waste profile information are addressed before the waste is received (i.e., physically accepted for treatment). If the LDR form is not part of

the incoming paperwork, Westates contacts the generator to request LDR forms via facsimile (Attachment 8). If all discrepancies are not resolved within five days, the waste is rejected and returned to the generator.

If all the required information checks out, the truck pulls into the facility and onto the bermed concrete containment pad (Photo Nos. 1 and 2). The waste is given a visual inspection to ensure it is carbon, that it is no more than 10% water, and that it contains no solid trash wastes. Approximately half the carbon wastes Westates treats are delivered in 55-gallon drums by trucks and are offloaded by forklift. The drums are sampled prior to being moved into the covered Container Storage Area (Photo Nos. 2 [exterior], and 3 [interior]).

For incoming drums, the square root of the number of drums in the shipment plus one is sampled. The sample is taken at a minimum depth of six inches below the top surface. Samples are analyzed at the onsite laboratory for pH and ignitability. Westates does not accept corrosive wastes.

Drummed wastes are moved into the Container Storage Area with a forklift, where a new Westates' hazardous waste label is affixed (white label in Photo No. 4), which identifies the generator, Westates' approval number, waste tally number, and the date the waste was received by Westates. Any discrepancies in waste profile information are also noted on the Westates' hazardous waste label. This label also assists Westates in their waste tracking system. Attachment 9 contains an example of Westates' waste tracking documentation (and compatibilities) for wastes received from Gibson Oil.

Carbon is also received in bulk loads either in 10,000-lb roll-off bins or 20,000-lb slurry trucks. One sample is pulled from each roll-off bin, and three samples are taken from representative locations in slurry truck loads. These samples are tested for pH and ignitability.

### Concrete Containment Pad

Before stepping onto the Concrete Containment Pad (CCP), Mr. Walsh provided the group with lightweight protective booties. He stated that these were used to prevent hazardous waste from being tracked outside the containment pad. Used booties are placed in a drum. The drum lid was not secure. Mr. Walsh explained that the booties are often reused; if the booties are no longer usable, a hazardous waste determination is made. The inspectors indicated to Mr. Walsh that if a waste is hazardous and is combined with nonhazardous wastes, all contents of the container become hazardous and should be managed accordingly. (This issue is not noted as a potential violation because the generator had not yet made a hazardous waste determination.)

After the trucks are offloaded by forklift on the CCP, the drummed wastes are moved into the controller storage area. The CCP appeared to have several cracks that had been filled with Sikadur® epoxy resin. One crack in particular appeared to be significant, and the epoxy filling may have seeped below the pad surface (Photo No. 5). This crack may affect the integrity of the containment pad.

Although Mr. McCue did not provide the exact capacity of the containment area, he stated that the containment capacity of the pad is greater than a 25-year flood and the capacity of the largest container located on the pad (Baker Tank-approximately 45,000 gallons).

Mr. Walsh explained that all containers stored on the CCP, including the Baker Tank, are free of hazardous wastes. The Baker Tank contains nonhazardous waste and was brought onsite to collect and store excess rainwater, which is cycled into the slurry process as needed. The 55-gallon drums seen in Photo Nos. 1 and 2 have been triple rinsed by the drum rinsing unit (Photo No. 6). Drums on the pad are awaiting shipment offsite to a drum reconditioner.

### Covered Container Storage Area

The covered Container Storage Area (CSA) (Photo No. 3) operates as a less than 90-day storage area for up to 100,000 gallons of hazardous waste in containers, as specified in the Part A Permit Application. Westates inspects the CSA on a daily schedule.

The CSA is divided into hazardous waste storage (Photo Nos. 3 and 6) and reactivated carbon product storage (Photo No. 7). On the hazardous waste storage side, the floor is divided by a sump system that collects any spills or wash waters. Liquids collected into the sump system are pumped into the treatment process. During the inspection, free liquid was observed on the floor of the CSA flowing toward the sump (Photo No. 3). Mr. Walsh stated that the liquid was clean water spilled from changing hoses that connect Hopper No. 1 (Photo No. 8) to the process feed tanks, and that is not hazardous.

Two rows of 55-gallon drums, double stacked, containing reactivated carbon "fines," which are considered hazardous waste because they are derived from listed hazardous wastes, are stored in the CSA (Photo No. 9). Mr. McCue explained that though this carbon had been treated and was now "reactivated," the particle size is too small or too fine to be sold to any of Westates' current customers. As a result, the fines (55-gallon drums) are labeled and managed as hazardous waste; they are marked with the appropriate accumulation start date. Westates is presently looking for a market for the reactivated carbon fines.

Also located in the CSA were two rows of 55-gallon drums, double stacked on pallets, which contain carbon scrubber waste. The scrubber was shipped to Westates in drums containing D018 waste. Mr. McCue stated that these wastes are not hazardous because the scrubber was triple rinsed, is reusable, and no longer exhibits the characteristic of toxicity.

Drummed wastes sent to Westates from BP Oil and located in the hazardous waste area of the CSA can be seen in Photo No. 4. Westates is able to track each movement of wastes

at their facility. Attachment 10 provides Operating Log tracking documentation for these drums of BP Oil wastes.

In the CSA, Hopper No. 1 (Photo No. 8) is used to mix carbon wastes from drums with process water from Tank T-9, (Photo Nos. 10 and 11) prior to transfer into the S02 Process Feed Tanks (T-1, T-2, T-5, and T-6) (Photo No. 11). Drums are placed onto the tipping unit, the drum is upended, depositing the carbon into the blue hopper mixing unit. Process water is added to slurry the mix, which then piped into the process feed tanks.

### **Control Room**

All the treatment process activities are coordinated by computer from the control room. The treatment process tank and piping system are designed to prevent overflows or releases, and to identify problems before they occur. The system is monitored from the control room. Tank level indicators signal an alarm light which flashes on the computer screen in the control room if tanks near capacity.

### **Facility Process Area**

The Facility Process Area is located behind the CSA. The process area is contained by a concrete pad that is sloped and bermed. This pad has a sump system (approximately 200 gallon capacity), and any nonhazardous liquids spilled into it would be pumped to Tank T-9 (recycle water storage tank).

The process area includes Tanks T-1, T-2, T-5, T-6 (process feed tanks), Tank T-8 (furnace feed tank) (Photo No. 11), Tank T-9 (recycle water storage tank), Tank T-12 (rainwater collection tank), and the Carbon Regeneration Unit (CRU) (Photo No. 12), which includes the thermal treatment unit (furnace), Tank T-8 (furnace feed tank) and other related equipment.

### Spent Carbon Regeneration (Treatment) Process

Spent carbon entering the treatment process via 55-gallon drums is slurried with process water from Tank T-9 in Hopper No. 1, then piped into one of the four process feed tanks (T-1, T-2, T-5 or T-6). At the time of this CEI, Tank T-5 contained approximately 20,000 pounds of carbon pellets.

Spent carbon arriving via roll-off bins or slurry trucks is transferred into the process area at Hopper No. 2, located adjacent to Tank T-12. Roll-off bins are lifted hydraulically at one end to tip the carbon waste into Hopper No. 2, and slurry trucks are fitted with hoses that pump carbon waste into the hopper.

Tank T-9 supplies recycled process water that is required to physically load carbon waste into the hoppers. The slurried carbon is then pumped into one of the process feed tanks (T-1, T-2, T-5, T-6).

The slurried carbon mix is then pumped to Tank T-8, the furnace feed tank (silver tank in the center of Photo No. 12), which is located on the fourth level of the CRU. Any overflow of process water from the process feed tanks is returned (via closed loop piping) to Tank T-9. Air displaced from the process feed tanks passes through a carbon adsorber (white tank in foreground of Photo No. 13) prior to being vented to the environment.

From the furnace feed tank (T-8), the carbon slurry mix is fed downwards into a dewatering screw (bottom of Photo No. 12) via a gravity-fed closed piping system, then into the multiple hearth furnace (Photo No. 13). (During the August 1993 CEI, fugitive emissions were noticed at the dewatering screw; no emissions were noted during this CEI). The furnace has four hearths. The first and uppermost is not fired; it operates at temperatures of 800-1000f (degrees fahrenheit). The second, third and fourth hearths are fired by natural gas burners at 1.5 million BTUs each, and operate at 1300f, 1550f, and 1600f, respectively.

The temperature of each hearth is monitored and controlled by computer in the control room. Carbon is passed through each hearth by rotating arms, and exits the furnace as reactivated product.

As spent carbon is reactivated by thermal treatment in the furnace, air emissions are vented through a vent stack at the top of the CRU. The stack emissions are monitored continuously.

The reactivated carbon exits the furnace and passes into a water-jacketed cooling screw, then into a product storage tank. From that storage tank, the regenerated carbon passes through a screener (Photo No. 14). The screener separates the fines from the reactivated product and channels the fines into a 55-gallon drum below the screener (Photo No. 15). Reactivated carbon to be sold as product is screened and packed into labeled bags, which are stored in the nonhazardous portion of the CSA (seen in Photo No. 7).

### **Laboratory**

The onsite laboratory is used to analyze samples to ensure that the incoming wastes are carbon, and that the waste meets the description in the waste profile sheet. The screening analysis includes pH and ignitability. Samples are maintained onsite for 30 days or until the waste has been treated.

### **DOCUMENT REVIEW**

After the physical inspection was completed, the following documents were reviewed onsite.

### **Manifests**

A number of hazardous waste manifests were reviewed at random. All manifests requested were made available, and no discrepancies were found.

### **Waste Analysis Plan**

The revised Waste Analysis Plan (WAP) was reviewed; it appeared to be complete and in compliance. Potential violations cited during the EPA CEI (August 17, 1993) were checked against the revised WAP. The potential violations appeared to have been corrected by Westates.

### **Contingency Plan**

The facility's Contingency Plan is maintained onsite and has been revised and updated to address deficiencies noted during the EPA August 17, 1993 CEI. All revisions and changes appeared to be complete and correct. The revised Contingency Plan is included as Attachment 11.

### **Employee Training Records**

Attachment 12 presents an overview of Westates' Hazardous Waste Training Program. Attachment 13 presents a breakdown (with course content) of the different personnel training modules. Training records for several Westates' employees were reviewed: Monte McCue, Westates' Plant Manager; Jeffrey Walsh, Environmental, Health and Safety Manager; Joseph Nierowski, (former) Westates' Lab Technician; and Mr. David Lowe, Westates' Material Handler.



In reviewing the training records for Mr. Walsh, it was noted that there is no job description associated with his job title: Environmental, Health and Safety Manager, as required by 40 CFR §265.16(d)(2). Mr. Walsh indicated that his title was a recent change and that the job description had not yet been added to the personnel training records.

### **Facility Inspection Logs**

Westates follows a written inspection schedule that includes hourly, daily, weekly and monthly schedules for inspection. Log sheets are used to accurately record inspection information. The schedule is kept onsite and was reviewed during the March 15, 1994 CEI. A number of inspection logs are included in Attachment 14.

### **Tank Assessments**

Rust Engineering Co. conducted evaluations of Westates' tank systems and reported their results in a document titled "Assessments of Tank Systems" and dated November 1993. Review of this assessment report found that on page 2, Section 2. b., the Professional Engineer recommends routine internal tank lining inspections; however, the time frame is not specified. The inspectors requested Mr. Walsh and Mr. McCue provide follow-up information regarding this issue. No follow-up information was provided to the inspectors during the CEI or during subsequent discussions to clarify this issue.

The same Rust Engineering report states that carbon steel pipelines without internal linings are susceptible to corrosion. Therefore, the corrosion should be monitored. There is no indication as to any schedule for corrosion monitoring pertaining to this issue. The inspectors requested that this issue be clarified also; however, no follow-up information from Westates has been provided.

The inspectors asked if 1-inch bolts had been installed at the base of the process tanks. In a follow-up letter from Mr. Walsh, he indicated they had.

### **Financial Assurances**

Notes taken during the inspection regarding financial assurances indicate that Westates has an insurance policy for closure with the National Guaranty Insurance Company, dated August 13, 1993, Endorsement No. 2, which increases the amount of assurance for closure from \$112,760.00 to \$117,642.00 effective June 1, 1993.

The documentation included information pertaining to financial assurances for sudden and accidental occurrences in the amount of \$1,000,000 (per occurrence) for sudden accidental occurrences, plus \$2,000,000 for annual aggregate coverage, exclusive of legal defense costs, effective April 25, 1993. Also effective on the same date is coverage for nonsudden accidental occurrences in the amount of \$3,000,000 per occurrence and \$6,000,000 annual aggregate coverage.

According to Ms. Elaine Schimmel, EPA Region IX, Westates' closure assurances were reviewed in November 1993; Westates was in good standing at that time. Westates will need to adjust these assurances for inflation prior to June 1994.

### **Biennial Report**

The inspectors requested a copy of the Biennial Report for review during the CEI. Mr. Walsh stated that Westates was in the process of completing the report, which would be submitted to EPA Region IX by the end of March 1994. In a letter to SAIC/TSC dated March 29, 1994, Mr. Walsh indicated that the estimated completion schedule for the Biennial Report is April 30, 1994. A copy of this letter is in Attachment 15. Since Westates

was not provided a copy of the report form from EPA until late February 1994, Westates has been granted an extension by Ms. Rebecca Smith of EPA Region IX.

### **Facility Closure Plan**

The facility's Closure Plan was reviewed in preparation for this report. At issue from the last CEI was the tanks' capacities listed in the Closure Plan versus the Part A Permit Application. Accurate capacities of individual tanks are listed on page 10 of the Closure Plan. Information pertaining to the cost of removal of fines, which are considered to be and are managed as hazardous waste (as of the date of the CEI) is not specified. However, Section 5.2 Procedures for handling and disposal of waste inventory, (5.2.1 Bulk Wastes) states that "Carbon fines, which have been treated (reactivated) will be sold as product." At the time of this CEI (March 15, 1994), Westates had not identified a market for the fines, but stated they are actively pursuing a market and expect to identify one soon. The Facility Closure Plan is included as Attachment 16.

## POTENTIAL VIOLATIONS

The following potential violation was noted during the inspection:

40 CFR §265.16(d)(2)      The personnel training records did not include a job description for the position of Environmental, Health and Safety Manager, as occupied by Mr. Walsh.

## LIST OF ATTACHMENTS

1. Photographs and Photograph Log
2. RCRA CEI Checklist
3. List of documents reviewed for the March 15, 1994 CEI
4. Part A Permit Application (December 17, 1993) and Associated Revisions
5. Compliance Order Counts (February 16, 1994) from the Previous EPA CEI
6. Westates Carbon-Arizona, Inc. Visitor Policy Statement
7. Westates Carbon-Arizona, Inc. Facility Diagram
8. Hazardous Waste Manifest and request for LDR Notice
9. Waste Tracking Logs
10. Operating Log for BP Oil Wastes Received in March 1994
11. Westates Carbon-Arizona, Inc. Contingency Plan
12. Hazardous Waste Personnel Training Program (Overview)
13. Training for Personnel Safety (Various Modules)
14. Facility Checklists and Inspection Logs
15. Letter From Mr. Walsh to SAIC re: status of the Biennial Report
16. Westates Carbon-Arizona, Inc. Facility Closure Plan



Photo No. 5      The concrete containment pad and the Sikadur® epoxy resin used to fill cracks. The epoxy appeared to have seeped into the crack below the pad surface, potentially affecting its integrity.

**ATTACHMENT 4**

**PART A PERMIT APPLICATION (December 17, 1993)  
AND ASSOCIATED REVISIONS**



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344  
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

*A Wheelabrator Technologies Company*

**VIA REGISTERED MAIL -**  
**RETURN RECEIPT REQUESTED**

December 17, 1993

Mr. Ray Fox, Permit Engineer  
Permits and Solid Waste Branch  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**RE: REVISED PART A PERMIT APPLICATION**  
**PARKER REACTIVATION FACILITY - PARKER, ARIZONA**  
**U.S. EPA ID NO: AZD 982 441 263**

Dear Mr. Fox:

Please find enclosed a revised Part A permit application for Westates Carbon - Arizona, Inc.'s (WCAI) Parker, Arizona Carbon Reactivation Facility. WCAI is submitting the revised Part A permit application to reflect current facility operations and in response to a request from EPA Region IX to clarify certain information submitted in the original Part A application. A list of specific revisions and clarifications can be found in Section 1.0, Introduction, of the enclosed document.

The signature of the Colorado River Indian Tribes could not be obtained before December 16, so their signature copy will be forwarded as soon as possible.

Please call me at 602-669-5758 if you have any questions concerning the revision.

Sincerely,

Monte McCue  
Plant Manager - WCAI

obtained from  
most recent  
PART A AAP.  
Dec. 93 File  
at EPA Rg. IX  
RCRA Records  
Center



## 1.0 INTRODUCTION

WCAI is submitting a revised Part A permit application to reflect current facility operations and in response to a request from EPA Region IX to clarify certain information submitted in the original Part A application.

Revisions include the following subjects.

1. Delete four waste codes listed in the application that are not and have never been accepted at the facility.
2. Delete a reference to three tanks as hazardous waste process units because these tanks do not hold hazardous waste or are classified as exempt units.
3. Revise Section IV of the application to reflect that the facility mailing address has changed.
4. Revise Section V of the application to reflect that the facility contact has changed.
5. Revise Section VII of the application to reflect that the facility operator's address and phone number have changed.
6. Revise SIC Codes found in Section IX of the application to more accurately define the type of activities performed at the facility.

The following issues are clarified.

1. The design capacity of the facility's reactivation furnaces.
2. The facility's process flow and how it relates to recycle streams.
3. The applicability of 40 CFR Part 265, Subparts AA and BB to the facility.

Explanations for the revisions can be found in Section 2.0 and the clarifications can be found in Section 3.0. The revised Part A permit application is included as a separate document.

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## 2.0 REVISIONS

### 2.1 Deletion of Waste Codes

Four RCRA hazardous waste codes are listed in the original Part A application but are administratively prohibited from receipt at the facility. These waste codes have never been accepted at the facility and are being deleted from Section XIV of the application. The waste codes to be deleted are F020, K062, K111, and K124.

### 2.2 Deletion of Tank Listings from Section XIII

In the original Part A permit application, three tanks are mistakenly listed in Section XIII under the process code of T04. The three tanks are as follows:

1. Water storage tank (T-9); holds recycle water that is used to transfer spent carbon from the spent carbon storage tanks to the reactivation unit.
2. Rainwater collection tank (T-12); collects rainwater run-off from warehouse roof and outdoor driveways.
3. Industrial discharge surge tank (T-11); collects scrubber blow-down water prior to discharge to municipal sewer system.

These three tanks are not hazardous waste process and/or storage tanks and should not have been included as such in the original application.

Tank T-9 contains water used to transfer carbon from the spent carbon storage tanks to the reactivation unit. Just prior to introduction into the reactivation process, the spent carbon is dewatered and the transport water is returned to T-9 where it is reused in the spent carbon transfer system. While this water is in the spent carbon transfer system it is a process material and not a waste; therefore, T-9 does not contain hazardous waste. For this reason, T-9 is being deleted from Section XIII of the application.

Tank T-12 contains rainwater that is collected from the containment pad and other processing areas of the facility. Rainwater is not a hazardous waste. For this reason, T-12 is being deleted from Section XIII of the application.

Tank T-11 contains scrubber blow-down that is stored prior to discharge to the local publicly-owned treatment works (POTW). Tank T-11 and its ancillary equipment include a pH adjustment mechanism prior to discharge to the POTW. This tank system constitutes a wastewater treatment unit that is exempt from the requirements of Part 264 in accordance with 40 CFR 264.1(g)(6). For this reason, T-11 is being deleted from Section XIII of the application.

### 2.3 Revision of Facility Mailing Address

The facility's mailing address has changed. Section IV of the application is being revised to reflect this change. The new address is now the same as the facility's physical location address. This address is as follows.

P. O. Box E  
Parker, AZ 85344

### 2.4 Revision of Facility Contact Information

The name of the facility contact and telephone number have changed. Section V of the application is being revised to reflect this change. The facility contact is now Monte McCue, the plant manager. His phone number is 602-669-5758.

### 2.5 Revision of Facility Operator Information

The address and phone number have changed. Section VII of the application is being revised to reflect these changes. The facility operator's address and phone number are as follows.

2523 Mutahar Street  
Parker, AZ 85344  
602-669-5758

### 2.6 Revision of SIC Codes

The SIC Codes listed in the current Part A application are inappropriate for the activities performed at the facility. Section IX is being revised to indicate a more appropriate representation of the activities performed at the facility. The new codes are 4953 -- Refuse Systems and 9999 -- Otherwise Unclassifiable Establishments.

### 3.0\* Clarifications

#### 3.1 Design Capacity

Section XII of the application requires the listing of design capacities of each of the hazardous waste processes being utilized by a facility. WCAI's current Part A application lists the design capacity for two reactivation furnaces at 1200 pounds per hour. 1200 pounds per hour represents the design capacity of the furnaces based on the capacity to produce reactivated product in one hour. Recent discussions with representatives of U.S. EPA, Region IX revealed that U.S. EPA prefers to designate design capacity as the feed rate into the facility's reactivation process.

In order to convert the 1200 pounds per hour output capacity originally listed in the Part A application into pounds per hour input capacity, the following explanation is provided.

Spent carbon is transported to the reactivation process as a slurry of spent carbon and water. Just prior to entering the reactivation process the spent carbon is dewatered using a dewatering screw. At this point the spent carbon contains its uncontaminated dry weight in water. The spent carbon also contains a contaminant loading of up to a maximum of 30 percent by weight. The following equation is used to determine the feed rate required to produce a given amount of product.

$$\text{Spent Carbon Feed Rate } \left( \frac{\text{lb}}{\text{hr}} \right) = \left( \text{Production Rate } \left( \frac{\text{lb}}{\text{hr}} \right) \times 2 \right) + \left( \text{Production Rate } \left( \frac{\text{lb}}{\text{hr}} \right) \times \% \text{ Contaminant Loading} \right)$$

Therefore the maximum feed rate in order to meet design production would be calculated as follows.

$$2,760 \frac{\text{lb}}{\text{hr}} = \left( 1,200 \frac{\text{lb}}{\text{hr}} \times 2 \right) + \left( 1,200 \frac{\text{lb}}{\text{hr}} \times 30\% \right)$$

The 2,760 lb/hr feed rate is the amount of feed required to produce 1,200 lb/hr of reactivated product.

#### 3.2 Simplified Process Flow Diagram

The original Part A application contained a schematic process flow diagram designated as Drawing No. 100606. This diagram has been replaced with Drawing No. 1135-002. Although Drawing No. 1135-002 is more detailed than Drawing No. 100606, it is more illustrative of the actual facility flows.

### 3.3 Applicability of 40 CFR Part 265, Subparts AA and BB

The cover letter submitted with the original Part A application indicated that the requirements found in 40 CFR Part 265, Subpart AA "Air Emissions Standards for Process Vents" and Subpart BB "Air Emission Standards for Equipment Leaks" were applicable to the facility. Further review of these Subparts indicates that they are not applicable to facility operations.

#### 3.3.1 Subpart AA "Air Emissions Standards for Process Vents"

Subpart AA applicability is established at 40 CFR Part 265, §265.1030, which states that Subpart AA applies to owners and operators of facilities that treat, store, or dispose of hazardous waste in units having process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw. None of these processes is present at the WCAI facility; therefore, Subpart AA is not applicable.

#### 3.3.2 Subpart BB "Air Emission Standards for Equipment Leaks"

Subpart BB applicability is established at 40 CFR Part 265, §265.1050, which states that Subpart BB applies to owners and operators of facilities that treat, store, or dispose of hazardous waste in equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight. Testing of the hazardous wastes treated and stored at the facility that contacts the type of equipment to which Subpart BB applies, indicates that the organic concentration of the wastes is less than 10 percent by weight; therefore, Subpart BB is not applicable.